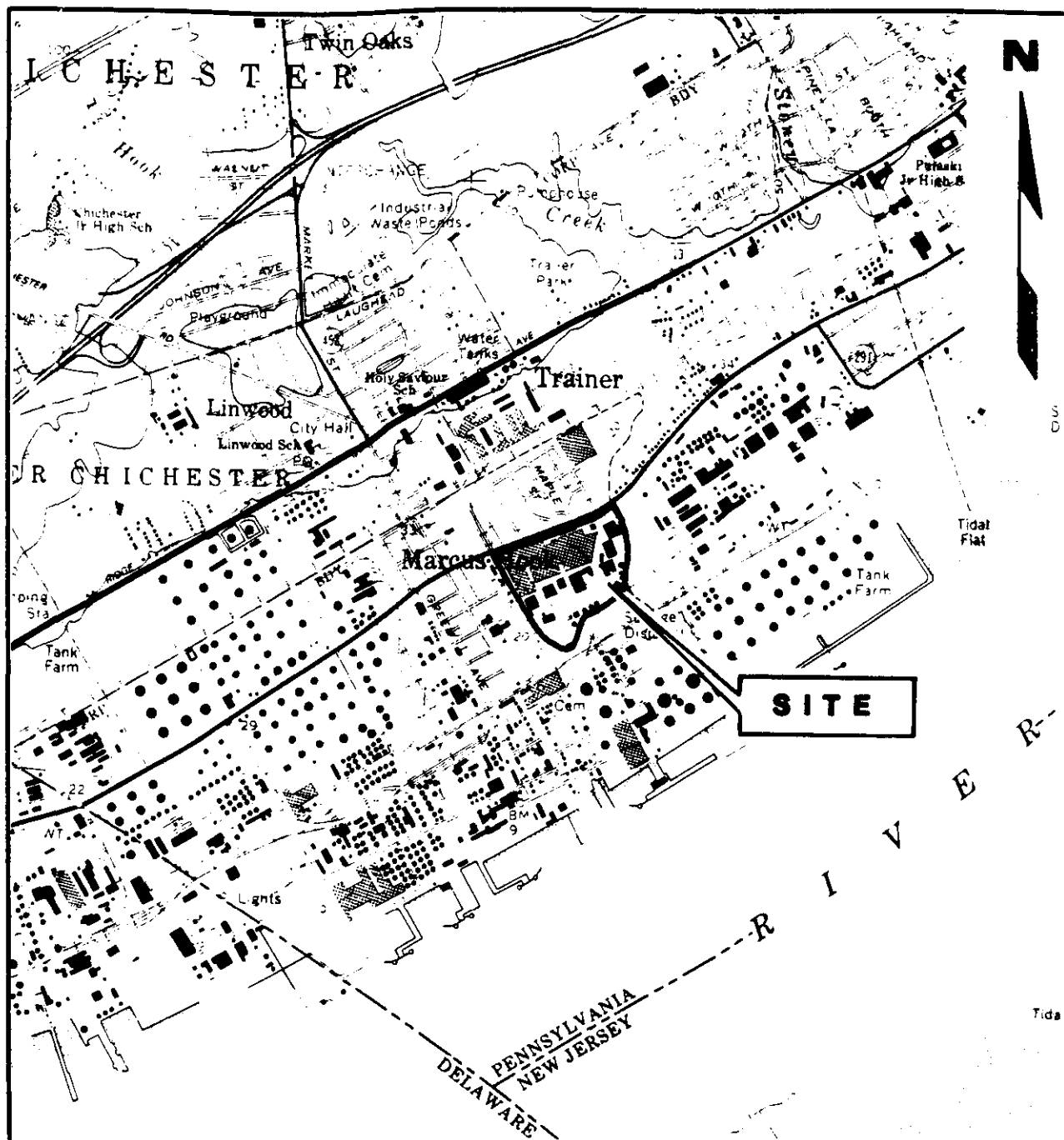


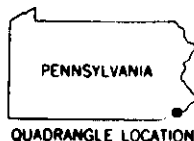
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RECEIVED

EAST TENTH STREET SITE MULTI-MEDIA BRIEFING



2000' 0 2000'



SOURCE: U.S.G.S. MARCUS HOOK, PA.-N.J.-DEL.,
QUADRANGLE 1967
7.5 MINUTES SERIES (TOPOGRAPHIC)
PHOTOREVISED 1988

Title:

SITE LOCATION MAP

EAST TENTH STREET SITE
MARCUS HOOK, PENNSYLVANIA

Prepared for:

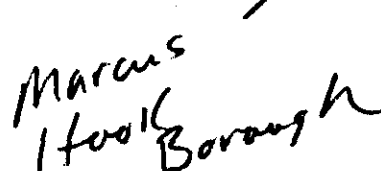
FMC CORPORATION

ROUX
ROUX ASSOCIATES INC
Environmental Consulting
& Management

| | |
|---------------------|--------------|
| Compiled by: P.J.P. | Date: 11/92 |
| Prepared by: M.A.V. | Scale: SHOWN |
| Project Mgr: G.D.M. | Revision: |
| File No. 01411J | |

Figure
1

10



Resolution Trust Corp. — Bldgs 1-3-7-17
LOT 8 thru 15
and portion of LOT 22

100590
Provident holds mortgage of 6A-6B-
T&K INCORPORATES own Lot 20, Lot 21

FACILITY DESCRIPTION

The Site is an approximately 30 acre facility on Route 13 in Marcus Hook, Pennsylvania. The Site is bordered by East 10th Street (Route 13) to the north, the BP Oil, Inc. to the east and by a school and residential and commercial properties to the west. Commercial and residential areas are located across East 10th Street to the north. The facility includes at least 11 standing buildings, a free standing fume stack and numerous foundations and remains of former buildings and other structures now demolished. Existing on the Site are a number of tunnels under and between buildings and former buildings on the Site. Several public roads transect the Site. At least five of the buildings on the Site are occupied.

During auction and salvage operations, between 1978 and 1986, equipment, pipes and materials and other structures were taken from buildings onsite including Buildings 1 and 3. When these items were taken, asbestos and other non-usable materials were stripped from them and left uncontained and in piles in the buildings. During renovation and demolition operations, asbestos insulation and asbestos materials were removed from buildings on the Site and dumped or stored or otherwise disposed of at the Site. During renovation and demolition operations polychlorinated biphenyl (PCB) oils, PCB-containing transformers, and PCB-containing transformer carcasses were removed from buildings on the Site and dumped or stored or otherwise disposed of at the Site. During viscose manufacturing operations between 1940 and 1977 by American Viscose Company (1940-1963) and FMC (1963-1977), wastes and products were stored in lagoons and tanks on Site.

COMPLIANCE HISTORY

A Unilateral Order pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) was issued December 1990 for the cleanup of asbestos to four individuals that EPA identified as operators of the Site. Those individuals failed to comply with the Order and, in fact, were pursued by EPA's Criminal Investigation Division for the unauthorized disposal of asbestos. On December 1, 1992, two of the individuals pleaded guilty and were subsequently convicted of illegally burying thousands of bags of asbestos throughout the Site.

Three CERCLA Consent Orders in February 1991 were issued to Marcus Hook Corporation, FMC and Lasso Group, respectively. To date, those entities have complied with the three Orders, which are in various stages of completion. A RCRA Corrective Action Order was issued to Marcus Hook Processing; a facility which operates the former FMC treatment facility and is adjacent to the East 10th Street Site. RCRA is in the process of reviewing the completed RFI for that facility.

b. FMC Corporation (in lots 8-15 and 20-22)

1. erect a snow fence around lots 8-15 and 20-22 to preclude the direct contact threat posed by PCB and lead contaminated materials.
2. placement of monitoring wells and sampling of groundwater to determine the presence of site-related contamination.
3. Conduct surface water and sediment sampling in Marcus Hook creek.
4. Conduct sampling of soil in adjacent lots.

c. Lassoff Group (in buildings 6a and 6b)

1. Conduct limited asbestos abatement

B. RCRA

1. One RCRA Corrective Action Order issued to:

- a. Marcus Hook Processing who operates the former FMC treatment facility (who processes acid wastes) for the investigation of soil and groundwater contamination.

SITE CLEANUP ACTIVITIES/CHRONOLOGY

1. The Lassoff Group completed asbestos abatement work in buildings 6A and 6B in January 1992 in accordance with the EPA approved work plan. EPA verified the completion of the work in May 1992.

2. The Resolution Trust Company (RTC), on behalf of the Marcus Hook Corporation, has completed abatement of asbestos in buildings 1,3,7 and 17. They have also completed removal of approximately 60 drums of PCB-contaminated material. Encapsulation of PCB contaminated cement and removal of transformer carcasses is pending.

3. FMC completed work in Lots 20-22 and 8-15 which included the constructing of a snow fence around Lots 20-22 and 8-15; Placement of and sampling from six groundwater monitoring wells; sampling of surface water and sediment in the Marcus Hook Creek; and surface soil sampling. The surface soil sampling indicated that extremely high levels of lead and PCBs exist at the Site and that the need for improved Site restriction may be warranted.

JUNE/JULY 1992

1. Asbestos abatement completed for buildings 1, 3, 7 and 17.
2. EPA reviews and comments on the PCB report submitted on behalf of MHC.
3. The Removal of 35 drums of PCB and mixed chemical waste took place. A total of 20 drums remain pending waste characterization and sampling of new drums and remaining drums.

4. Site visit with TSCA and ATSDR to review PCB transformer sampling areas.

AUGUST/SEPTEMBER 1992

1. Sampling Analytical generated by EPA confirmatory sampling of debris/soil piles received and indicated that increased Site restriction necessary.
2. Fence to be constructed around the perimeter of lot 15 due to high levels of lead contaminated soil. FMC is in the process of constructing a more permanent fence.

OCTOBER 1992

1. Fence constructed around lot 15 by FMC.
2. 13 drums removed from building three, 6 drums remain pending additional characterization.

NOVEMBER 1992

1. Received analytical results from FMC.
2. Requested that MHC conduct additional asbestos abatement in occupied areas of building one due to concerns expressed by ATSDR. MHC challenged the need for additional work and invoked the dispute resolution provision under the Order.

DECEMBER 1992

1. Removal of drums in building 3 completed by MHC.
2. Dispute Resolution meeting was held to discuss additional asbestos abatement, aggressive air monitoring, and operation & maintenance plan.
3. Draft summary of analytical results yielded lead and PCB's above removal action levels.
4. NIOSH agreed to perform the aggressive air monitoring in building 1.
5. Final HRS package signed off by the Region and sent to Headquarters. HRS score greater than 70, well above the 28.5 that is required to list a site on the National Priorities List.

JANUARY 1993

1. Niosh completes air sampling in building 1.

MARCH 1993

1. NIOSH air sampling data submitted and indicated that no asbestos fibers were present in the areas tested.

APRIL/MAY

1. Marcus Hook Corporation to provide WP for the removal/disposal of PCB transformers.
2. FMC to supply WP to fence lots to limit contact threat of

the lead and PCB-contaminated soils on lots 8-15 and 20-22.

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(200)

MULTI-MEDIA STATUS

To SCA

1. Multi-Media goals

Upon consultation with the Hazardous Waste Management Division (HWMD) Remedial, RCRA, and the Air Division it appears that Multi-Media enforcement potential is limited. The Air Enforcement Branch has no enforcement capability at the facility due to the absence of a viable Site operator. RCRA has deferred enforcement at the Site because of what they outlined as minor RCRA issues, and because the areas of concern are not the traditional operating facility. Enforcement on behalf of Toxics and Pesticides is pending, however their issues will be resolved with any cleanup conducted under CERCLA. The Remedial Branch is at the early stage of involvement. The Project Manager will continue to communicate with the other potentially involved divisions to solicit information on their enforcement capabilities, as well as ARARs .

2. General Enforcement Strategy

The absence of any true owner/operator makes it difficult to proceed with any enforcement action at this Site. Currently the majority of the facility is under the control of the Resolution Trust Corporation (RTC), the Government Agency designated to deal with the savings and loan crisis. They assumed control when Bell Savings Bank, the institution that held the major portion of the loan on the property, failed. Bell assumed the loan when the present owner declared bankruptcy. Discrete lots are owned by individuals, however a PRP search for the entire Site with regard to the environmental concerns on each property is ongoing. Without the ability to take action against the true owner/operator, enforcement options are remote.

3. Names of Enforcement Team Members

1. Bob Guarni- Team Leader
2. Zelma Maldonado- RCRA
3. James Feeney- Remedial
4. Ed Cohen- Toxics and Pesticides

4. Milestones for The Next Year

The Site has been proposed for listing on the next NPL update. The Site has been confirmed as a SACM Site whereby the remedial investigation will be expedited. A strategy is being developed to do the remedial work.

COMPLIANCE HISTORY

I. INVESTIGATION ACTIVITIES

1. Multi-Media Inspection (November 8-9, 1990)

Findings:

*Asbestos (Bldgs. 1,3,6a)

- Asbestos containing material (ACM) throughout Building areas in piles, on pipes, in bags (400 in basement of Bldg. 6) and broken floor tiles.

*Asbestos (Lots 10, 11, 20, 21, 22)

- Broken bags of asbestos in Steam Tunnels (400 ft), over 10,000 bags of asbestos filling, mixed with construction debris in a 20' by 20' by 50' hole.

*PCBs (Bldgs. 3, 6a, 6b, 7, 17)

- 50-75 gallons of PCBs from leaking transformers.

*PCBs (Lots 10, 11, 21, 22)

*Bldg. 3

- 58 drums of unknown fluids stored in the basement labeled "antibacterial"

*Other

- Numerous gas cylinders, volatile organics, metals, transformer carcasses, sulphides, sludge lagoons, acid salts, underground tanks of carbon disulfide.

2. Information Request Letters (January-April 1991)

*Section 104 (e) of CERCLA

*Section 3007 (a) of RCRA

*Section 114 (a) of CAA

*TSCA 114 (a) Subppenas

II. CIVIL ENFORCEMENT ACTIONS

A. CERCLA

1. Administrative Unilateral Orders issued December 1990 to:

- Jeanie Alvarez - *named as one operator*
- Dennis H. Marchuck - *owner operator*
- Marcus Hook Business & Commerce Center, Ltd. - *owner*
- Strath Haven Realty, Inc. - *owner-operator*

These Orders required the Respondents to remove and properly dispose of the asbestos and PCB contaminated materials.

2. Three Removal Consent Orders issued February 1991 to:

- a. Marcus Hook Corporation to perform in (buildings 1,3,7,17 and various lots):

1. removal of PCB-contained material
2. encapsulation of PCB-contaminated concrete
3. asbestos abatement

T & K Corporation - owner / ~~operator~~